

March 24, 2023

VIA ECF

MEMO ENDORSED.

The Honorable Ona T. Wang
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Cassava Sciences, Inc. v. Bredt, et al.*, No. 22-cv-9409(GHW)(OTW): Joint Status Letter Pursuant to March 8, 2023 Order of Magistrate Judge Ona T. Wang (Dkt. 85)

Dear Judge Wang:

Pursuant to the Court's directive at the March 8, 2023 status conference, counsel for Plaintiffs and Defendants met and conferred on March 15, 2023 regarding the issuance of third party preservation notices. Plaintiff has issued preservation notices to all third parties identified in its Rule 26(a) disclosures. Defendants will have sent by close of business today preservation notices to all third parties identified in their Rule 26(a) disclosures, with the exception of persons and entities affiliated with Cassava, The City College of New York ("CUNY"), and IMIC Inc., who will have or will be receiving preservation notices from counsel for Cassava. Plaintiff and Defendant QCM are continuing to meet and confer regarding the issuance of preservation notices to unnamed individuals referred to in the QCM Report, but not identified in QCM's Rule 26(a) disclosures.

The Parties anticipate that they will resolve all issues by March 31, 2023, and respectfully request an additional week to provide the Court with confirmation that these issues have been resolved.

Respectfully submitted,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Timothy Frey
Counsel for Cassava Sciences, Inc.

ATTORNEYS FOR PLAINTIFF(S):

/s/ Timothy M. Frey

Erik Connolly
Benesch Friedlander Coplan & Aronoff
71 S. Wacker Drive
Ste 16th Fl.
Chicago, IL 60606
312-212-4949
Email: econnolly@beneschlaw.com

Timothy M Frey
Benesch Friedlander Coplan & Aronoff
71 S. Wacker Drive
Suite 1600
Chicago, IL 60606
312-212-4949
Email: tfrey@beneschlaw.com

Kathleen Watson Moss

ATTORNEYS FOR DEFENDANT(S):

/s/ Meghan K. Spillane (via email)

Jeffrey A. Simes
Goodwin Procter, LLP (NYC)
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 813-8879
Fax: (212)-355-3333
Email: jsimes@goodwinprocter.com

Meghan K. Spillane
Goodwin Procter LLP
The New York Times Building,
620 Eighth Avenue
New York, NY 10018
(212) 813-8800
Fax: (212) 355-3333
Email: mspillane@goodwinlaw.com

Benesch Friedlander Coplan & Aronoff LLP
71 S. Wacker Dr.
Ste 1600
Chicago, IL 60606
312-212-4949
Email: kwatsonmoss@beneschlaw.com

Matthew John Langley
Benesch Friedlander Coplan & Aronoff LLP
71 S. Wacker Drive, Suite 1600
Chicago, IL 60606
312-624-6408
Email: mlangley@beneschlaw.com
Attorneys for Plaintiff Cassava Sciences, Inc.

Attorneys for Defendants David Bredt
and
Geoffrey Pitt

/s/ Alisa Benintendi (via email)
Kleinberg, Kaplan, Wolff & Cohen, P.C.
551 Fifth Avenue
New York, NY 10176
(212) 986-6000
Fax: (212) 986-8866
Email: dlevy@kkwc.com

Alisa Benintendi
Kleinberg, Kaplan, Wolff & Cohen, P.C.
Kleinberg, Kaplan, Wolff & Cohen, P.C.
500 Fifth Avenue
New York, NY 10110
212-880-9871
Email: abenintendi@kkwc.com

Joshua Kallman Bromberg
Kleinberg, Kaplan, Wolff & Cohen, P.C.
500 Fifth Avenue
New York, NY 10110
212-986-6000
Email: jbromberg@kkwc.com
Attorneys for Defendant Quintessential
Capital Management LLC

/s/ David Kumagai (via email)

Daniel F Wachtell
Law Office of Daniel F. Wachtell
90 Broad Street
23rd Floor
New York, NY 10004
917-667-6954
Email: dan@danwachtell.com

David Robert Shine Kumagai
Clarick Gueron Reisbaum LLP
Clarick Gueron Reisbaum LLP

220 5th Ave
14th Floor
10001
New York, NY 10019
212-633-4310
Email: dkumagai@cgr-law.com

Isaac Berkman Zaur
Clarick Gueron Reisbaum LLP
220 Fifth Avenue
New York, NY 10001
(212) 633-4310
Fax: (212) 478-9484
Email: izaaur@cgr-law.com
Attorneys for Defendants Adrian Heilbut,
Jesse Brodtkin, and Enea Milioris

The parties shall file a joint status letter by April 7, 2023.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Ona T. Wang', with a large, stylized loop at the end.

Ona T. Wang 3/27/23
U.S.M.J.